UNITED STATES DISTRICT COURT CLERK USDC EDWI EASTERN DISTRICT OF WISCONSIN

2022 JUN 28 P 12: 01

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 22 - (R-136)

MARQUIS ALEXANDER BROOKSHIRE,

[18 U.S.C. §§ 2119(1), 922(g), 924(c), and 924(a)(2)]

Defendant.

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about April 12, 2022, in the State and Eastern District of Wisconsin,

MARQUIS ALEXANDER BROOKSHIRE,

with intent to cause death and serious bodily harm, took a motor vehicle that had been transported, shipped, and received in interstate and foreign commerce from T.H. by force, violence, and intimidation.

In violation of Title 18, United States Code, Section 2119(1).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 12, 2022, in the State and Eastern District of Wisconsin,

MARQUIS ALEXANDER BROOKSHIRE

knowingly used, carried, and brandished a firearm during and in relation to a crime of violence, namely motor vehicle robbery as charged in Count One of this Indictment.

In violation of Title 18, United States Code, Section 924(c)(1)(A)(ii).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. On or about April 15, 2022, in the State and Eastern District of Wisconsin,

MARQUIS ALEXANDER BROOKSHIRE,

knowing he previously had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm, which, prior to his possession of it, had been transported in interstate commerce, the possession of which was therefore in and affecting commerce.

2. The firearm is more fully described as a Ruger, 9mm, semi-automatic pistol, model number SR9C, bearing serial number 334-14790.

All in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

FORFEITURE NOTICE

Upon conviction of the offenses in violation of Title 18, United States Code, Sections 922(g) or 924(c) as set forth in Counts Two and Three of this Indictment, the defendant, Marquis Alexander Brookshire, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the knowing violation of Section 922(g) or 924(c), including, but not limited to: a Ruger, 9mm, semi-automatic pistol, model number SR9C, bearing serial number 334-14790.

A TRUE BILL:

FUREPERSUN

Dated: 6-28-22

RICHARD G. FROHLING